

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 17-cv-916 (CRC)
)	
U.S. DEPARTMENT OF JUSTICE,)	
)	
Defendant.)	
)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE SUMMARY JUDGMENT MOTION**

The U.S. Department of Justice respectfully moves the Court to extend all summary judgment briefing deadlines in this case by one week. The case involves a Freedom of Information Act request for Federal Bureau of Investigation records related to Christopher Steele, some of which have been withheld in part and marked with notations indicating the statutory basis for each withholding. As the FBI has prepared its declaration in support of the government's motion for summary judgment, it has revised some of the exemptions claimed in support of its withholdings, and has accordingly re-marked the documents withheld in part. The Department of Justice requests a one-week extension of all deadlines to allow sufficient time for the FBI to re-release the documents withheld in part and for undersigned counsel to finalize a brief consistent with those updated claims of exemption.

Undersigned counsel discussed these developments with counsel for Judicial Watch, who consented to the following schedule for summary judgment briefing in this case:

March 15, 2019	Department of Justice's motion for summary judgment
April 19, 2019	Judicial Watch's cross-motion and opposition
May 24, 2019	Department of Justice's opposition and reply
June 13, 2019	Judicial Watch's reply

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

MARCIA BERMAN
Assistant Director
Federal Programs Branch

/s/ James Bickford
JAMES BICKFORD
Trial Attorney (N.Y. Bar No. 5163498)
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20530
James.Bickford@usdoj.gov
Telephone: (202) 305-7632
Facsimile: (202) 616-8470

Counsel for Defendant

Date: March 5, 2019

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JUDICIAL WATCH, INC.)	
)	
Plaintiff,)	
)	
v.)	Case No. 17-cv-916 (CRC)
)	
U.S. DEPARTMENT OF JUSTICE,)	
)	
Defendant.)	
)	

[PROPOSED] ORDER

The Department of Justice’s consent motion for an extension of time to file its summary judgment motion is **GRANTED** and the parties are **ORDERED** to comply with the following deadlines for summary judgment briefing:

- | | |
|----------------|---|
| March 15, 2019 | Department of Justice’s motion for summary judgment |
| April 19, 2019 | Judicial Watch’s cross-motion and opposition |
| May 24, 2019 | Department of Justice’s opposition and reply |
| June 13, 2019 | Judicial Watch’s reply |

SO ORDERED this _____ day of _____, 2019.

Christopher R. Cooper
United States District Judge